

## Risk Assessment Form (RA1)

<b>Department:</b>	<b>Service:</b>	<b>Reference:</b>
<b>Activity:</b> Coronavirus (COVID-19) asymptomatic testing in schools <i>(staff testing and testing of pupils prior to return to school)</i>  <b>Version 2.1 Updated 21 January 2021 (See orange coloured text for updates; also recorded in Document History)</b> <a href="#">Click here</a> for the risk assessment template relating to testing in Primary schools, school-based nurseries and maintained nursery schools <b>This assessment has been produced by the NCC Corporate Health and Safety Team in collaboration with the NCC Public Health Team.</b>		<b>Site:</b> Wooler First School & Glendale Community Middle School (LFD testing for all staff across our settings and for pupils in Year 7 and Year 8).
<b>People at Risk:</b> School Staff, Pupils, Volunteers  <i>All staff and volunteers are aware of the content of this risk assessment. The assessment will be kept under review by the immunisation team manager.</i>		<b>Additional Information:</b> <a href="#">guidance on completion: risk assessment form</a>  <i>See end of this document for links to further information and useful links.</i>

<b>Name of Person Completing Form:</b>	<b>Job Title:</b>	<b>Date:</b>	<b>Review Date:</b>
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Hazard	Risk	Initial Rating L, M, H	Existing Control Measures	Final Rating L, M, H	Additional Action Required (action by whom and completion date – use separate Action Plan if necessary)
Symptomatic persons may present at school to take test	Covid transmission	H	<p>Clear instructions are issued to parents and staff that anyone with Covid symptoms or who lives with someone who is showing symptoms of Covid must self-isolate immediately and book a test through the NHS symptomatic testing programme.</p> <p>If a symptomatic pupil attends school or lives with someone who is showing symptoms of Covid, the child is isolated, and the parents are contacted immediately and asked to collect the child (see also "Pupil test is</p>	L	

			confirmed as positive“ p. 10).		
School bubble/cohort groupings compromised by testing process	Transmission of Covid virus between separate school cohort groups. Consequential need for targeted testing of a much larger number of additional close contacts	H	<p>Testing will be carried out in class/bubble groups for Year 7 &amp; Year 8 on an on-going basis.</p> <p>Testing programme is managed in line with the schools Covid risk assessment (social distancing, hand and respiratory hygiene, face coverings, ventilation, cleaning etc.) and with due consideration to the NHS Test and Trace Risk Assessment Template, Standard Operating Procedure and NTP Handbook (see Schools Document Sharing Platform – Templates) Schools Document Sharing Platform – Templates)</p> <p>All pupil tests will be supervised by staff who are trained in the agreed test procedures and protocols.</p> <p>Testing will be conducted at a dedicated testing site in school conforming to the “Key Layout Requirements.” Those awaiting test results are kept in an agreed waiting area until the results are known.</p>	L	You can use this <a href="#">leaflet</a> to explain testing to pupils, parents and staff.
Close contact (within 2m) with individuals being tested and contact with potentially infectious test samples and other materials (eg contaminated PPE)	Exposure to virus resulting in contracting Covid	H	<p>Testing site set up is configured in line with the LFD Testing SOP to provide separate Registration Area, Swabbing Bay(s), Receiving Area(s), a Processing Area and Recording Area.</p> <p>Swabbing bays are configured to maintain adequate distancing according to the LFD Testing SOP as follows (we are using our science lab for LFD testing with a single swabbing bay):</p> <ul style="list-style-type: none"> <li>Open plan station: where “open plan” sample testing stations are provided such as tables laid out in the school hall, these should</li> </ul>	L	Sufficient supplies of PPE (including eye protection, face masks, gloves and aprons) have been delivered and sufficient stocks are maintained.

			<p><i>be constructed in such a way as to maintain 2m social distancing.</i></p> <p><i>Trained staff in place in line with NTP Handbook workforce profiles and package outlined by the LFD Testing SOP.</i></p> <p><i>Testing team wear suitable PPE as defined for each role, follow donning and doffing processes, change PPE at the required frequencies (e.g., between sessions, those with gloves change them after each sample) as directed by the <a href="#">“How To Guide - Requirements by Role”</a>.</i></p> <p><i>Arrangements for queueing reviewed and established with social distancing being maintained and one-way circulation where possible. Staff on hand to supervise pupils and implementation of arrangements.</i></p> <p><i>Signage displayed reminding all of requirements to maintain social distancing and for the wearing of face covering where distancing may not be maintained.</i></p> <p><i>Floor markings put in place to aid queue management and compliance.</i></p> <p><i>Most roles defined in the workforce profile can maintain social distancing, except for the test assistant.</i></p> <p><i>Face covering worn at all times by staff and students attending for testing except for brief lowering at time of swabbing.</i></p> <p><i>Testing staff supervise queueing, test subjects flow, distancing and wearing of face coverings and provide</i></p>		
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			<p>reminders where necessary</p> <p>Measures in place to allow test subjects to cleanse hands prior to entering the testing area.</p> <p>Regular cleaning in place as per the NHS Test and Trace NTP Handbook and SOP (all staff are aware of their role in relation to frequency of cleaning).</p> <p>Furniture that may impede flow, queue, social distancing etc. are removed to prevent unnecessary clutter.</p> <p>A strict protocol is in place for the storage and handling of test samples as per the NHS Test and Trace Risk Assessment Template, LFD Testing SOP and NTP Handbook (see Schools Document Sharing Platform – Templates).</p>		
<p>Testing process not implemented correctly</p> <p>Insufficient testing capacity established in the school</p> <p>LFD Kit capability compromised by incorrect handling/storage.</p> <p>Insufficient/inappropriate resources available</p>	<p>Covid transmission</p> <p>Invalid/false result leading to repeat swab being needed.</p> <p>Incorrect result communication or inability to communicate result</p> <p>Anxiety of staff/pupils.</p> <p>Misunderstanding</p>	H	<p>A quality management system is in place and a designated member of the team is identified to act as Quality Lead; they have the accountability for quality and risk management of the service (this may be carried out by the Covid Coordinator).</p> <p>Testing requirements have been calculated and the corresponding number swabbing Desks/Administered Swabbing determined using the ready reckoner within the <a href="#">“How To Guide”</a>. Quality lead monitors capacity and requirements as testing proceeds.</p> <p>Testing resource availability and site key layout requirements checked prior to commencement against the <a href="#">“How To Guide”</a>.</p> <p>Deliveries are checked on receipt to ensure kits are</p>	L	<p>[*the government recommends schools use 1-2 school staff with the remainder being volunteers (e.g. NCC volunteers, agency staff, governors, St John Ambulance etc). Reasonable workforce costs will be reimbursed. When deciding on the number of individuals required for these roles, consider the requirement to provide cover for any sickness/self-isolation absences. Larger schools are likely to require a higher number of individuals assigned to these roles, especially during periods of close contact testing]</p>

<p>Damaged barcode, lost LFD, failed scan of barcode</p>	<p>leading to incorrect process being followed.</p>	<p>complete (using the <a href="#">“How To Guide”</a>) and in good condition and stored in a secure, area away from damp conditions at temperature between approx. 2 ° C and 30 °C.</p> <p>A designated team is provided to undertake the *Workforce Profile Roles as defined by COVID-19 National Testing Programme: Schools &amp; Colleges Handbook (the NTP Handbook) to support the process.</p> <p>The Workforce Planning Tool (see <a href="#">Planning Tools</a>) has been used to determine roles and numbers of personnel used.</p> <p>The workforce has received the designated Online Training** to ensure continuity of testing process including the correct use and allocation of barcodes to reduce risk of wrong allocation of samples and the miscoding of results.</p> <p>Designated test sites meet key layout requirements defined by the NTP Handbook.</p> <p>Lateral flow tests are stored between 2 and 30 degrees C in a secure location in accordance with manufacturer's guidance and in a dry environment where there is little chance of foreseeable damage. Devices and reagents must be between 15 and 30 degrees C when in use (room temperature).</p> <p>A written school specific process is established prior to testing with Team Leader and Test Subjects Registered. Test results added to the schools Test Register. All samples are correctly handled, labelled, logged and disposed of. Kits arriving in damaged</p>	<p>[**The details and a link to the online training are included in the <a href="#">Training Guide for Rapid Testing in Schools and Colleges</a>]</p> <p>Links to Online Registration Forms: <a href="#">Team Leader</a>, <a href="#">Test Subjects</a>, <a href="#">Logging Results</a>.</p>
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			<p>condition are reported to DfE via contact details within Schools and Colleges <a href="#">“How To Guide”</a>. Process outlines action to take where barcodes are damage/fail, LFD is lost or administrative error leads to inability to communicate result and outlines re-test requirements. The process is periodically reviewed with a Senior School Manager.</p> <p>All students will be fully briefed on the required process to collect and handle samples.</p> <p>Instructional Posters and Test Instruction Booklet for Pupils (contained within NTP Handbook) are made available and on display.</p> <p>LFD testing is carried out in the morning where possible.</p>		
Not accounting for Special Educational Needs and Disabilities leading to adverse response	<p>Emotional/physical distress, exacerbation of existing health complication</p> <p>Unable to carry out test</p>	H	<p>In cases where difficulties carrying out test occur, or where these are anticipated, a person-centred approach is taken. The test and associated concerns have been discussed with the child or young person and their family to ensure understanding of the process, support the person making the consent decision, anticipate any particular adverse response and agree strategies that are appropriate.</p> <p>Where necessary parents/carers attend to support the child or young person and the test process. Consideration has been given to specialist staff administering swabs for those who cannot self-administer.</p> <p>Care is taken to ensure the testing area and manners adopted are as calm and reassuring as possible.</p>	L	Where it is deemed testing cannot be carried out safely refer to section: ‘Testing without appropriate consent; Staff and/or pupils declining the test’

			<p><i>Additional time for conducting tests and time during breaks are planned to ensure testing is not rushed to help manage potential anxieties. Consideration is given to incorporating relaxing activities and refreshments to help.</i></p> <p><i>In situations where the physical nature of the test present problems the approach will be reviewed. With a throat swab (e.g., difficulty in understanding instructions, ability to keep mouth open or a strong gag reflex) a nose swab from both nostrils will be taken instead. Similarly, if a nose swab is not possible a throat swab alone will be taken.</i></p>		
<i>Exposure to chemicals contained in LFD kits</i>	<i>Potential health hazard</i>	<i>L</i>	<p><i>Under the intended conditions of use, the quantities concerned and component chemicals are not defined as hazardous and therefore do not have hazard labels associated with them (as per the NHS Test and Trace Risk Assessment Template, (see Schools Document Sharing Platform – Templates).</i></p> <p><i>PPE to be maintained as stated below.</i></p> <p><i>Spillages to be wiped from surfaces in line with standard cleaning protocols.</i></p> <p><i>Testing staff briefed not to use LFD kits/solution that has expired processes for disposal.</i></p>	<i>L</i>	
<i>Inappropriate use/handling/disposal of waste (including used LFD kit/PPE)</i>	<i>Covid transmission</i>	<i>H</i>	<p><i>Appropriate PPE for each workforce profile is worn (as described in NTP Handbook and <a href="#">“How To Guide”</a>). Staff are trained on how to put on and take off PPE in the correct way. (PHE - <a href="#">Putting on PPE</a>; PHE - <a href="#">Taking off PPE</a> <a href="https://youtu.be/-GncQ_ed-9w">https://youtu.be/-GncQ_ed-9w</a>)</i></p>	<i>L</i>	<p><i>PPE/waste bags have been delivered to each school.</i></p> <p><i>[Incinerating specified healthcare wastes at a municipal waste incinerator: RPS C23 Under the COVID19 RPS C23</i></p>



			<p><i>Handwashing / hand-hygiene facilities provided in accordance with NTP handbook</i></p> <p><i>Testing kit disposed of in accordance with COVID-19 National Testing Programme Guidance and the How to Guide:</i></p> <p><i>Existing general waste contractor* has been contacted to provide additional wheelie bins, one for each waste category. Waste is noted as Healthcare Waste (not Clinical Waste) and is therefore bagged accordingly as required. Bins are clearly marked for each waste category as follows:</i></p> <ol style="list-style-type: none"> <li><i>1. 'general' - black bags (e.g., LFD packaging)</i></li> <li><i>2. 'chemical' - yellow/clear bags* (e.g., swabs, tissues, cartridges)</i></li> <li><i>3. 'offensive' - tiger bags (e.g., PPE, Mop Heads, Cloths).</i></li> </ol> <p><i>* Yellow are used in preference but where there are shortages white or clear bags are used.</i></p> <p><i>The different wastes are stored separately in an area dedicated to testing waste.</i></p> <p><i>Clinical waste is stored securely to prevent unauthorised access (ideally for 72 hrs prior to collection where possible).</i></p>		<p><i>regulatory position, waste contractors are able to remove and dispose of waste generated from the LFD testing kits without varying their permit.]</i></p> <p><i>[*Schools are advised to; contact their existing waste contractor in the first instance about disposal and provide <a href="#">Government Guidance outlining waste codes for disposal of LFD</a> and the <a href="#">Waste letter for Providers</a>.</i></p> <p><i>If they are unable to collect then contact your existing hygiene waste provider or if they are unable to assist contact NCC (email: <a href="mailto:centralwasteteam@northumberland.gov.uk">centralwasteteam@northumberland.gov.uk</a>). Finally, the DfE Coronavirus helpline may be contacted for assistance on 0800 046 8687]</i></p> <p><i>Waste storage is reviewed noting that:</i></p> <ul style="list-style-type: none"> <li><i>• where there is not enough space 'chemical' (2) and 'offensive' (3) wastes may be stored in the same bin providing they are in the correct bags.</i></li> <li><i>• It is permissible to use existing bins providing they are separated from the establishments overall general waste and are clearly marked.</i></li> </ul>
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					<ul style="list-style-type: none"> <li>Future requirements for bin bags (only initial supplies are provided. The <a href="#">“How To Guide”</a> provides further information on anticipated waste volumes.</li> </ul>
Inadequate cleaning	Transmission of Covid19	H	Whilst robust cleaning regimes are already in place in the school environment, an enhanced cleaning regime is in place within the testing site, in line with the guidance in the SOP. All staff involved are aware of cleaning requirements relevant to their role.		
Testing without appropriate consent  Staff and/or pupils declining the test	Covid positive individuals exposing others in school to Coronavirus	H	<p>School has established a plan for communication with parents, pupils and staff in consideration to NTP Handbook suggestions.</p> <p>All parents, pupils and staff have been sent a letter explaining the test process and completed the registration details attached (<a href="#">template &amp; registration details letter</a> to parents, pupils and staff.) A signed <a href="#">consent form</a> has also been received.</p> <p>Whilst testing is not mandatory, the school will encourage pupils and their parents and staff to participate to reduce the risk of Covid transmission.</p> <p>Schools ensure robust data handling processes with due regard to data security and handling. Test result records are kept for 14 days and then confidentially disposed of.</p> <p>Staff members are provided with the information pack and NTP Handbook explaining the test procedure and are encouraged to discuss any concerns with staff prior to testing.</p> <p>Tests will only be performed once formal consent has been obtained.</p>	L	

Application of swab samples results in involuntary reaction (e.g. vomiting, gag reflex)	Covid transmission arising from staff or pupil contact with another person's body fluid	H	<p>Testing centre set up in accordance with LFD Testing SOP.</p> <p>Pupils/staff provided with instructional information and trained. Staff are on hand to provide guidance and reassurance.</p> <p>Spillage kits to be on hand and social distancing maintained with others.</p> <p>Operations at the testing bay/booth/station shall be ceased and the site personnel will follow the spillage guidelines until the area has been cleaned adequately to allow resumption.</p> <p>Where it is not possible to maintain operations due to compromised distancing to spillages or it is likely that the event may induce vomiting in others the test area should be evacuated until the area has been cleaned.</p> <p>Cleaning guidelines set out within the LFD Testing SOP are to be observed.</p> <p>Cleaners and any staff in proximity are to ensure appropriate PPE is in place as relevant to their role (as defined by LFD Testing SOP), avoid Subject contact within 2 meters and change their PPE after cleaning.</p>	L	Sufficient disposable vomit bowls and spill kits will need to be ordered for each station
Exposure of Clinically Extremely Vulnerable (CEV) /Clinically Vulnerable (CV) Staff to Covid19 virus	Transmission of COVID19 with symptoms that may be exacerbated by their personal characteristics/ underlying health condition	H	<p>CEV staff do not take part in testing.</p> <p>CV staff do not take part in testing wherever possible. If this is unavoidable, only specific roles should be considered where strict social distancing can be maintained/no contact with samples. Staff must not supervise (if needed) those pupils who subsequently test positive. Existing individual risk assessments for staff who are CV and taking part in testing are</p>	L	

			<i>reviewed and updated.</i>		
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### Confirmation of a positive test

Hazard	Risk	Initial Rating L, M, H	Existing Control Measures	Final Rating L, M, H	Additional Action Required (action by whom and completion date – use separate Action Plan if necessary)
Staff test is confirmed as positive	Exposure of others to live virus resulting in contracting Coronavirus	H	<p>Staff member/ Head Teacher / School Lead is notified immediately, and the staff member is requested to book a PCR test straight away. PHE guidance on self-isolation is followed - <a href="#">Stay at Home</a> - unless the confirmatory PCR test is negative. The staff member should wear a face covering to minimise transmission. PCR testing is conducted outside of school (either at dedicated test centre or by use of home test kits).</p> <p>Refer to <a href="#">School risk assessment</a> and procedure for dealing with symptomatic persons on site (including the arrangements for 'deep cleaning' school facilities, identifying close contacts etc).</p> <p>Close contacts are identified and advised to self-isolate in line with <a href="#">Government Stay at Home guidance</a>. The other household members of those self-isolating do not need to self-isolate unless the child, young person or staff member they live with in that group subsequently develops symptoms. If a close contact in a class or group that has been asked to self-isolate develops symptoms themselves within their isolation period they should follow <a href="#">guidance for households with possible or confirmed coronavirus (COVID-19) infection</a>.</p> <p>Household contacts of those identified as close contacts of the positive case, do not need to self-isolate unless that individual subsequently develops symptoms.</p>	L	<p>Confirmed cases of Covid-19 should be recorded via ANVIL, as they may be RIDDOR reportable.</p> <p>Any transmission of Covid19 where it is likely the result of a breach in the asymptomatic testing process will be reportable to the HSE as a notifiable disease. You should seek further advice via NCC's Corporate Health and Safety team (or your own H&amp;S provider for some Academies)</p>
Pupil test is confirmed as	Covid transmission from person who	H	Pupils will be fully briefed prior to testing regarding the implications and procedure if they test positive. They	L	Schools are provided with a number of PCR tests which can be issued to

positive	<p><i>has tested positive</i></p> <p><i>Pupil anxiety following confirmation they have Covid 19</i></p>	<p><i>should be reassured that symptoms are likely to be mild.</i></p> <p><i>Pupils will remain in their classroom or designated waiting area when waiting to receive test results. Any pupils who test positive will be moved immediately to a place of isolation until they can be picked up by parents/carers.</i></p> <p><i>Parents are alerted in advance that they may need to collect children who test positive and arrange for a PCR confirmation test to be carried out the same day (where possible). They are strongly advised to wear a fluid resistant mask (IIR) where available or a conventional face covering. PCR testing is conducted outside of school (either at dedicated test centre or by use of home test kits).</i></p> <p><i>School processes and risk assessments are reviewed to account for the possibility that the person collecting a pupil(s) who has tested positive may also be Covid-19 positive. Household contacts (ie. sibling attending the same establishment) of those identified as close contacts of the positive case, do not need to self-isolate unless that individual subsequently develops symptoms or has a positive confirmed PCR test.</i></p> <p><i>Refer to <a href="#">School risk assessment</a> and procedure for dealing with symptomatic persons on site (including the arrangements for 'deep cleaning' school facilities, identifying close contacts etc).</i></p> <p><i>Close contacts of the pupil who has tested positive are identified and advised to self-isolate in line with <a href="#">Government Stay at Home guidance</a></i></p> <p><i>If a close contact in a class or group that has been asked to self-isolate develops symptoms themselves</i></p>	<p><i>parents where needed to facilitate a speedy confirmation test.</i></p> <p><i>Follow "What to do if a pupil/student tests positive for COVID-19" guidance within COVID-19 National Testing programme: Schools &amp; Colleges Handbook.</i></p>
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			<p>during their isolation period they should follow <a href="#">guidance for households with possible or confirmed coronavirus (COVID-19) infection</a>.</p> <p>Site specific arrangements include restricting access to the premises to outside or limited areas only and enhanced measures see <a href="#">COVID-19 School Risk Assessment</a> "Contact with others who may have Coronavirus". <a href="#">[SCHOOLS TO DELETE AND EDIT ACCORDING TO THEIR SITE-SPECIFIC ARRANGEMENTS]</a></p>		
<p>Travel home following positive test (unescorted).</p> <p>Parents unable to collect pupil after positive test</p>	<p>Exposure of others to live virus resulting in contracting Coronavirus</p>	H	<p>The school's existing process for symptomatic children is followed.</p> <p>Children should not use public transport. Where a child or young person is able to wear a face covering and keep a safe distance from others they could also walk or cycle where this is possible (or appropriate given their age/ability).</p> <p>Pupils who test positive must be kept in isolation until they can be collected by a member of their family or household. In exceptional circumstances, if this is not possible, and the school needs to take responsibility for transporting them home, or if a pupil needs to be transported to a residential setting, you should do one of the following:</p> <ul style="list-style-type: none"> <li>• use a vehicle with a bulkhead or partition that separates the driver and passenger</li> <li>• the driver and passenger should maintain 2 metres from each other</li> </ul> <p>For both options:</p> <ul style="list-style-type: none"> <li>• the driver should wear PPE, including a fluid resistant facemask (IIR) which should also be worn by the passenger.</li> </ul>	L	

			<ul style="list-style-type: none"><li>• <i>The vehicle must be cleaned thoroughly afterwards, in line with <a href="#">government guidance</a>.</i></li></ul>		
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## Further Information

Government/Public Health England Advice: <https://www.gov.uk/coronavirus> / [\*Coronavirus \(COVID-19\) asymptomatic testing in schools and colleges\*](#) / [\*Asymptomatic testing in schools and colleges - GOV.UK\*](#)

[\*Mass asymptomatic testing: schools and colleges\*](#)

[\*Mass asymptomatic testing in specialist settings\*](#)

[\*Clinical Standard Operating Procedure for Mass Testing with Lateral Flow Antigen Testing Devices in Schools and Colleges \(LFD Testing SOP\)\*](#)

HSE Advice: <https://www.hse.gov.uk/news/coronavirus.htm>

NHS: [\*NHS Hand Washing Techniques\*](#)

COVID-19 National Testing Programme: [\*“How to Guide” Rapid Testing in Schools and Colleges\*](#)

[\*COVID-19 National Testing programme: Schools & Colleges Handbook\*](#)

[\*Northumberland Education – links to all Covid testing documentation\*](#)

## Document History

Item	Nature of change	Date of Update
<a href="#">Testing without appropriate consent</a>	Text deleted relating to protocol to apply where close contacts decline serial testing	21/01/2021
<a href="#">Symptomatic persons may present at school to take test</a>	Removal of reference to daily (serial) testing.	21/01/2021
<a href="#">Staff test is confirmed as positive</a>	Removal of reference to daily (serial) testing and added about reverting to protocol of self-isolation.	21/01/2021
<a href="#">Pupil test is confirmed as positive</a>	Removal of reference to daily (serial) testing and added about reverting to protocol of self-isolation.	21/01/2021
<a href="#">Further Information</a>	Link added to "Mass asymptomatic testing: schools and colleges" 07 January 2021, COVID-19 National Testing Programme: "How to Guide" Rapid Testing in Schools and Colleges, Mass asymptomatic testing in specialist settings,	12/01/2021
<a href="#">Testing Process not Implemented Correctly</a>	Wording relating to actions taken for establishing testing capacity, checking test site conditions, layout, receipt of deliveries, storage added and reporting damage added/enhanced. Reference to the "Workforce Planning Tool" inserted.	12/01/2021
<a href="#">Inappropriate use/handling/disposal of waste</a>	Additional information concerning procedures to be applied for handling and storing of waste and information to be given to waste disposal contractors.	12/01/2021
<a href="#">Close contact (within 2m) with individuals being tested and contact with potentially infectious test samples and other materials</a>	Replaced reference to "NTP Handbook" with the "How to Guide" to improve provision of information on PPE requirements.	12/01/2021
<a href="#">Pupil test is confirmed as positive</a>	Additional note added regarding circumstances that would necessitate isolation - " <i>positive confirmed PCR test</i> " and circumstances where PCR testing is to be undertaken.	12/01/2021

<a href="#">Staff test is confirmed as positive</a>	Note added regarding circumstances where PCR testing is to be undertaken.	12/01/2021
<a href="#">Not accounting for Special Educational Needs and Disabilities leading to adverse response</a>	New section.	12/01/2021
New document		07/01/2021